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17 October 2017  
File No. 129778-002

SUBJECT: Jeffrey Energy Center - Groundwater Monitoring Systems Certification  
Bottom Ash Area 1 Impoundment, Bottom Ash Area 1 Landfill, Fly Ash Landfill, and Flue Gas Desulfurization Landfill  
Westar Energy, Inc.

Westar Energy, Inc. (Westar) operates the existing coal combustion residuals (CCR) management units referred to as the Bottom Ash (BA) Area 1 Impoundment, BA Area 1 Landfill, Fly Ash (FA) Landfill, and Flue Gas Desulfurization (FGD) Landfill at the Jeffrey Energy Center (JEC) located in St. Marys, Kansas. These CCR units are considered subject to the CCR Rule since they were active as of the effective date of the CCR Rule. This document addresses the requirements of §257.91 *Groundwater Monitoring Systems*, specifically section §257.91(f), of the US Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 (CCR Rule) effective 19 October 2015. This document serves as certification that the units comply with the requirements defined in the CCR Rule. This certification has been prepared based upon information made accessible by Westar pursuant to §257.91(e)(1).

Westar has determined that a multi-unit groundwater monitoring system is preferred for the BA Area 1 Impoundment and BA Area 1 Landfill as allowed pursuant to §257.91(d). This multi-unit monitoring system is as capable of detecting monitored constituents passing through the combined unit waste boundary as individual groundwater monitoring systems.

The single-unit groundwater monitoring systems at the FA Landfill and FGD Landfill and the multi-unit groundwater monitoring system at the BA Area 1 Impoundment and Landfill have been designed to include as a minimum one upgradient and three downgradient monitoring wells pursuant to §257.91(c). The number, locations, and depths of wells used in the groundwater monitoring systems are sufficient and appropriate to characterize the quality of groundwater flowing beneath each single or multi-unit monitoring system based on site conceptual models and site-specific geologic conditions.

Pursuant to CFR Title 40 Chapter I Subchapter I Part 257 Subpart D §257.91(f), I certify that the groundwater monitoring systems for the BA Area 1 Impoundment, BA Area 1 Landfill, FA Landfill, and FGD Landfill have been designed and constructed to meet the requirements of §257.91. The certification submitted is, to the best of my knowledge, accurate and complete.

Signed:   
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Certifying Engineer

Print Name: Steven F. Putrich, P.E.  
Kansas License No.: PE24363  
Title: Senior Associate  
Company: Haley & Aldrich, Inc.

